

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	CRIMINAL NO. 21CR30084-SPM
)	
JOHN G. FODERO, II,)	
Defendant.)	

STIPULATION OF FACTS

Comes now, Steven Weinhoef, United States Attorney for the Southern District of Illinois, and Jennifer Hudson, Assistant United States Attorney, together with the Defendant, John G. Fodero, II, and his attorney, Todd Schultz, and hereby enter into the following Stipulation of Facts consistent with Section 1B1.3 of the United States Sentencing Guidelines pertaining to the Defendant's relevant conduct.

1. On December 20, 2019, John G. Fodero, II purchased 611 E. Seventh Street in Centralia, Illinois within the Southern District of Illinois.
2. Beginning no later than June 21, 2020 and continuing through February 26, 2021, Fodero invited persons who used and sold fentanyl and methamphetamine into this residence.
3. On June 21, 2020, emergency personnel responded to 611 E. 7th Street because Gregory Carpenter overdosed. Emergency workers located Carpenter laying on the living room floor unconscious. Narcan was administered to Carpenter who revived.
4. On July 3, 2020, emergency personnel responded to 611 E. 7th Street because Karen Sloan overdosed. Kaitlyn Hoffman led emergency personnel into the living room area where Sloan was found unresponsive. Brandon Sloan informed emergency personnel that he administered two doses

of Narcan. Emergency personnel administered another two doses of Narcan to Sloan and Sloan recovered. While at 611 E. 7th Street, five persons who did not live at the home were present.

5. Three days later, on July 6, 2020, emergency personnel responded to 611 E. 7th Street because Danielle Brown overdosed. When law enforcement arrived, Brown was conscious and refused to be taken to the hospital. EMS reported that Brown overdosed on heroin.

6. On August 12, 2020, emergency personnel responded to 611 E. 7th Street because Donald Hemmings overdosed. Someone at the residence already possessed and provided Narcan to Hemmings. When emergency personnel arrived, Hemmings was conscious and breathing. Law enforcement recovered a hypodermic needle on the driveway.

7. On August 27, 2020, emergency personnel responded to 611 E. 7th Street because Bailee R. Lyday overdosed. When EMS arrived Lyday was passed out and not breathing. Emergency personnel administered Narcan to Lyday. Lyday recovered and declined further treatment.

8. The next day, on August 28, 2020, emergency personnel responded to 611 E. 7th Street because Danielle M. Brown overdosed. Brown does not live at 611 E. 7th Street but visits 611 E. 7th Street to use fentanyl. That day, Brown took fentanyl, overdosed, and was not breathing when emergency personnel arrived to render aid.

9. On August 29, 2020, law enforcement responded to 611 E. 7th Street due to a shooting. As a result, a search warrant was executed at 611 E. 7th Street. During the search, law enforcement located fentanyl capsules and a baggie of methamphetamine inside of the residence. Additional fentanyl was located within the garage. Law enforcement documented eight people present in the house.

10. On September 27, 2020, EMS was called because Elexis D. Gibson overdosed at 611 E. 7th Street. Gibson managed to call for help on her own and Narcan was administered.

11. On October 18, 2020, emergency personnel responded to 611 E. 7th Street for another overdose. When emergency personnel arrived, Kellie Whitehouse was not breathing. Law enforcement administered Narcan. Additional fentanyl was located in Whitehouse's possession. Five persons were present in the home when emergency personnel responded.

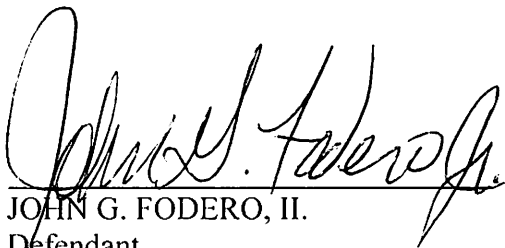
12. On January 2, 2021 emergency personnel responded to 611 E. 7th Street because Danielle M. Brown overdosed and was not breathing. Narcan was administered by emergency personnel. Brown does not live at 611 E. 7th Street. Brown travels to 611 E. 7th Street to use fentanyl.

13. On February 26, 2021, emergency personnel responded to an overdose call. The fire department arrived first and rendered aid to Elexis Gibson. Gibson was unresponsive and did not respond to Narcan. Law enforcement video shows a large number of non-residents gathered in the home.

14. Based upon the number of non-resident visitors, the number of overdoses, finding fentanyl and methamphetamine inside the home, law enforcement opines that John G. Fodero, II uses the residence at 611 E. 7th Street for others to use and distribute controlled substances.

15. John Fodero's residence located at 611 E. 7th Street stands approximately 400 feet from Centralia Junior High school and its grounds.

SO STIPULATED


JOHN G. FODERO, II.
Defendant


JENNIFER HUDSON
Assistant United States Attorney


TODD SCHULTZ

10/25/21

10-25-21

Counsel for the Defendant